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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

DOCKETED

MAY 16 2001

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In the Matter of Investigation into
US West Communications, Inc.'s
Compliance with Certain Wholesale
Pricing Requirements for Unbundled
Network Elements and Resale
Discounts

Docket No: T-00000A-00-0194

**NOTICE OF FILING
TESTIMONY OF
EDWARD J. CAPUTO
ON BEHALF OF
WORLDCOM, INC.**

WorldCom, Inc. ("Wcom") hereby files the testimony of Edward J. Caputo in the
above-referenced matter.

RESPECTFULLY SUBMITTED this 16th day May, 2001.

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BEFORE THE ARIZONA CORPORATION COMMISSION

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Commissioner

IN THE MATTER OF INVESTIGATION)	
INTO QWEST CORPORATION'S)	
COMPLIANCE WITH CERTAIN WHOLESLE)	Docket No. T-00000-A-00-0194
PRICING REQUIREMENTS FOR UNBUNDLED)	PHASE II
NETWORK ELEMENTS AND RESALE)	
DISCOUNTS)	

**DIRECT TESTIMONY OF
EDWARD J. CAPUTO
ON BEHALF OF WORLDCOM**

MAY 16, 2001

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1 **EXECUTIVE SUMMARY OF TESTIMONY OF EDWARD J. CAPUTO**

2 Directory Assistance and Operator Services ("DA/OS") must be provided as UNEs unless
3 Qwest provides customized routing. As a UNE, the pricing must be TELRIC or cost-based
4 pursuant to Section 251(c)(3) of the Act. If Qwest does provide customized routing, it is still
5 obligated to provide nondiscriminatory access to DA/OS pursuant to Section 251(b)(3).
6 Nondiscriminatory access means that it must offer DA/OS services at the same price it offers
7 those services to others, including itself. A market-based pricing methodology, therefore, is
8 inherently discriminatory.

9 DAL information, on the other hand, is still a UNE and must be provided at TELRIC-
10 based prices. Even if the Commission decides the FCC has not extended UNE status to DAL, the
11 Commission is free to determine otherwise under Section 251. Moreover, DAL is also subject to
12 the nondiscriminatory access provisions of Section 251(b)(3) and the Commission should adopt a
13 nondiscriminatory pricing methodology based on cost.

14 Qwest's proposals and pricing regarding customized routing are too vague for
15 Worldcom to comment upon except to the extent that they discriminate and impose unreasonable
16 costs on other carriers. However, WorldCom would welcome an opportunity to discuss its routing
17 needs with Qwest to determine whether its offerings would, indeed, be a viable option for
18 WorldCom.

19 With regard to call related databases, Qwest is obligated to provide LIDB and ICNAM as
20 UNEs at TELRIC-based prices. Worldcom also requests nondiscriminatory access to the ICNAM
21 database on a bulk transfer basis. In addition, as UNEs, Qwest may not discriminate or impose
22 use restrictions on these network elements through any alternate pricing schemes it may propose.

1 **INTRODUCTION AND PROFESSIONAL EXPERIENCE**

2 **Q. Please state your name, title and business address.**

3 **A.** My name is Edward J. Caputo. I am Director of Operator and Directory
4 Services for WorldCom. My business address is 601 South 12th Street,
5 Arlington, Virginia 22202.

6 **Q. What is your educational background?**

7 **A.** I attended the University of Maryland in College Park, Maryland, and earned a
8 Bachelor of Science degree in Business Management. I am a candidate for a
9 Master's degree in Telecommunications Management at George Washington
10 University in Washington, D.C.

11 **Q. Would you please provide a brief description of your professional**
12 **experience?**

13 **A.** I have held management positions in the telecommunications field for the last 11
14 years. Prior to that, I held management positions in the Information Technology
15 and Finance field. I have had management responsibilities at WorldCom and its
16 predecessor entity, MCI, since 1990 in the area of Operator and Directory
17 Services.

18 **PURPOSE OF TESTIMONY**

19 **Q. What is the purpose of your testimony?**

1 **A.** The purpose of this testimony is to support the position of WorldCom, Inc.
2 ("WorldCom") with regard to Qwest's pricing of customized routing, directory
3 assistance and operator services ("DA/OS"), directory assistance listing ("DAL")
4 databases, and call-related databases, specifically the line information database
5 ("LIDB") and calling name database ("CNAM").

6

7 **DA/OS SERVICES**

8 **Q.** **What are Qwest's obligations with respect to DA/OS?**

9 **A.** The FCC, in its *UNE Remand Order*¹, specified that where the incumbent carrier
10 does not provide customized routing, it must continue to offer DA/OS as UNEs
11 pursuant to 47 USC § 251(c)(3). *UNE Remand Order* at ¶ 462. To the extent that
12 Qwest may provide customized routing, however, Qwest remains obligated to
13 provide DA/OS under the principles of "dialing parity" which includes the duty to
14 allow nondiscriminatory access to DA/OS pursuant to 47 USC § 251(b)(3). *Id.*

15 **Q.** **Is Qwest's proposed "market-based" pricing for DA/OS discriminatory?**

16 **A.** Yes. Regardless of whether Qwest offers DA/OS as a UNE, at the very least,
17 Qwest's pricing for DA/OS must be nondiscriminatory. As the *UNE Remand*
18 *Order* made clear, "competitive carriers who wish to obtain OS/DA from the
19 incumbent may do so consistent with the incumbent LEC's nondiscriminatory

¹ *Third Report and Order and Fourth Further Notice of Proposed Rulemaking*, CC Docket 96-98, FCC 99-238, released November 5, 1999 ("*UNE Remand Order*").

1 access obligations under Section 251(b)(3).” *UNE Remand Order*, at ¶ 455. See
2 also, *DAL Provisioning Order* at ¶ 35,² regarding a LEC’s obligation with regard
3 nondiscriminatory access to its DA database.

4 “Nondiscriminatory” applies not only to what Qwest charges other
5 carriers, but must also be relative to what Qwest charges itself. For example,
6 even if Qwest were to overcharge every carrier, while its prices may be
7 nondiscriminatory with respect to those other carriers, the prices would
8 discriminate between Qwest and all other carriers. In its *Local Competition Third*
9 *Report & Order*, the FCC stated that, “Because an incumbent LEC would have
10 the incentive to discriminate against competitors by providing them with less
11 favorable terms and conditions that it provides to itself, we conclude that the term
12 “nondiscriminatory”, as used throughout section 251, applies to the terms and
13 conditions an incumbent LEC imposes on third parties as well as on itself.”³

14 Because Section 251(b)(3) mandates nondiscriminatory access between all
15 competitive providers, however, and especially because Qwest is the incumbent
16 carrier, Qwest must provide DA/OS services at the same price it provides these
17 services to itself. The only way to determine what price Qwest provides DA/OS

² *Provision of Directory Listing Information under the Telecommunications Act of 1934, As Amended*, CC-Docket No. 99-273, FCC 01-27, released, January 23, 2001 (“*DAL Provisioning Order*”).

³ *Local Competition Third Report & Order*, FCC 99-227, ¶ 129 (1999), citing *Local Competition Second Report and Order*, at ¶¶ 100-05, and *Local Competition First Report and Order*, at ¶ 217.

1 to itself, is for Qwest to provide a cost study in this proceeding, which it has not
2 done.

3 Market-based prices are inherently discriminatory to competitive
4 providers who have not had the advantage or have enjoyed the economic and
5 market-based benefits of an entrenched incumbent as Qwest has. Consequently,
6 such a market-based methodology has no basis being considered in this
7 proceeding. Moreover, Qwest provides no evidence that the prices it proposes are
8 grounded in the market or are market-based in any way. If the nondiscriminatory
9 access requirement of Section 251(b)(3) is to be adhered to, the Commission must
10 consider the costs based on a cost study and a market-based methodology must be
11 rejected.

12 The FCC's *UNE Remand Order*, clearly stated, however, that although
13 DA/OS may not be considered a UNE where customized routing is provided,
14 Section 251(b)(3) will continue to obligate all carriers to provide
15 nondiscriminatory access to DA/OS services. *See, UNE Remand Order*, at ¶ 464.
16 Because Section 251(b)(3) mandates nondiscriminatory access as between *all*
17 providers, however, and especially because Qwest is the incumbent carrier, Qwest
18 must provide DA/OS services to Worldcom and other CLECs at the same price it
19 provides these services to itself.

1 Qwest's testimony on this issue ignores the simple fact that the
2 nondiscriminatory principles of dialing parity under Section 251(b)(3) of the Act
3 must be applied to OS/DA services even where those services may be no longer
4 unbundled.

5 **CUSTOMIZED ROUTING**

6 **Q. What is Worldcom's position with respect to Qwest's customized**
7 **routing?**

8 **A.** Qwest must provide customized routing to WorldCom in a manner consistent
9 with WorldCom's requirements and as prescribed by the FCC in its *UNE Remand*
10 *Order*. Until Qwest meets these obligations, it must provide DA/OS to
11 WorldCom and others as a UNE under Section 251(c)(3) of the Act at TELRIC
12 rates. It is Worldcom's understanding, from language in the *UNE Remand Order*,
13 that Qwest's obligation extends to all carriers and that this routing scheme must,
14 in fact, be customized for each requesting carrier.

15 Qwest has indicated in the *Direct Testimony of Barbara J. Brohl*, at page
16 15, that it may in fact meet WorldCom's and other carrier's needs for customized
17 routing. Despite the description in its testimony, however, WorldCom needs to
18 meet with Qwest's switch engineering organization to document WorldCom's
19 needs. Worldcom has developed an engineering proposal using existing local
20 switch features and functionality which meets its customized routing needs.

1 WorldCom can provide Qwest with documentation that specifies WorldCom's
2 customized routing requirements. If Qwest can meet WorldCom's customized
3 routing needs, WorldCom should be able to request such routing at any time
4 during the term of its interconnection agreement.

5 **Q. What about Qwest's proposed pricing for customized routing?**

6 **A.** Qwest does not propose an actual price for any of the three categories of charges
7 it identifies under the customized routing category, but rather lists "ICB" or
8 "individual case basis" as the appropriate amount. Based on the rate proposal
9 introduced in this proceeding, however, it is impossible to determine whether
10 Qwest's rates for customized routing are necessary, reasonable and
11 nondiscriminatory. For example, Qwest's nonrecurring charge for "all other
12 custom routing" is too vague and not defined especially to the extent that it would
13 be levied on an individual customer basis. WorldCom requests that the
14 Commission reject Qwest's attempt to levy charges in this area unless and until
15 Qwest performs a valid cost study and until Qwest provides evidence that it has
16 not already recovered such costs.

17 Moreover, Worldcom objects to Qwest's proposed pricing to the extent
18 that such costs reflect Qwest's individual development costs to implement such a
19 customized routing scheme as between all carriers. Consistent with Section
20 251(b)(3) and Section 251(c)(3) requirements, Worldcom believes that CLEC's
21 should only be required to pay for routine implementation costs of customized

1 routing. To require otherwise would be both unreasonable and discriminatory.

2 Since the FCC has determined that the provision of customized routing is
3 a condition precedent to the elimination of Qwest's duty to provide OS/DA
4 services as a UNE under Section 251(c)(3), CLECs should then not be penalized
5 if Qwest implements a high cost customized routing solution. If Qwest is allowed
6 to simply push off the costs of developing a solution onto each individual
7 competitive carrier, that carrier is not only burdened by the fact that it can no
8 longer obtain DA/OS services at UNE rates, but then must bear the costs of
9 developing a customized routing solution. Such a result is patently discriminatory
10 not only to competitive carriers as a whole, but would allow Qwest to
11 discriminate against carriers individually based upon their individual customized
12 routing needs.

13 WorldCom also objects to Qwest's customized routing charges to the
14 extent that it might force WorldCom to pay for switching services for which it
15 already pays Qwest either on a facilities-based or UNE-P basis. Despite the fact
16 that Qwest lists three separate categories of charges, Qwest does not provide
17 enough detail to determine what substantive work is required to justify those
18 charges.

19 **DAL DATABASE**

20 **Q. How are DA/OS services different from DAL database information?**

1 **A.** DAL information is the underlying customer listing information that constitutes
2 the directory assistance database. DA/OS is a service or services related to
3 assisting callers in finding a customer's listing or in completing a call. The two
4 are not the same network elements. Although the FCC's *UNE Remand Order*
5 reclassified DA/OS services as a UNE only in the absence of customized routing,
6 the FCC identified DAL database as a call-related database.

7 **Q.** **Is the database a UNE?**

8 **A.** Yes, the DAL database is a UNE. The FCC identified directory assistance
9 databases as call-related databases under the heading, "ELEMENTS THAT
10 MUST BE UNBUNDLED" in its Executive Summary of the UNE Remand
11 Order. *See, UNE Remand Order*, Executive Summary, ¶ 15. Although the FCC
12 decided in its *UNE Remand Order* that DA/OS services were no longer UNEs, the
13 Order did not specifically find that the DAL database itself was no longer a UNE.
14 Although, the FCC did make clear that nondiscriminatory access is required for
15 the DAL database under dialing parity as between all carriers, it is Worldcom's
16 position that the FCC did not change the ILEC's responsibilities with regard to
17 making the DAL database available as a UNE.

18 Furthermore, even if the DAL database is no longer considered a UNE by
19 the FCC, there is nothing to prevent the State of Arizona from declaring it as such
20 under Section 251 of the Act. The factors cited by the FCC in the UNE Remand

1 Order concerning the necessary and impair standard with respect to DA/OS
2 services are not necessarily applicable with respect to the DAL database.

3 For example, although the FCC cited competition in the DA/OS services
4 industry for the provision of DA/OS services, the fact that the ILEC remains the
5 only reliable source for DAL information means that without such data from the
6 incumbent, Worldcom is put at a direct competitive disadvantage. Because Qwest
7 remains the largest presence in the local market by virtue of its incumbency and
8 gleans its DAL information directly from the customer service order process, it
9 alone has direct access to the most accurate and comprehensive DAL database in
10 the market. Accordingly, Qwest should offer nondiscriminatory prices at
11 TELRIC-based prices to other carriers.

12 **Q. Is DAL pricing also subject to the nondiscriminatory requirements of Dialing**
13 **Parity?**

14 **A.** Yes. For the same reasons described earlier with regard to DA/OS, DAL is also
15 subject to the Act's nondiscriminatory provisions regarding dialing parity
16 pursuant to Section 251(b)(3) of the Act. This obligation is in addition to an
17 ILEC's obligation to provide DAL as a UNE, as ALL CARRIERS are required to
18 allow nondiscriminatory access to DAL pursuant to dialing parity.

19 In the FCC's recent *DAL Provisioning Order*, the FCC recognized that
20 LECs continue to charge competing DA providers like WorldCom, discriminatory
21 and unreasonable rates for DAL. Although it declined to adopt a specific pricing

1 structure for DAL, it encouraged states to set their own rates consistent with the
2 nondiscriminatory and reasonable requirements of dialing parity. In doing so, the
3 FCC specifically recognized that state imposed rates based on cost-based models
4 utilizing valid cost studies were consistent with dialing parity. The Commission
5 specifically cited a decision of the New York PSC that analyzed cost studies from
6 the ILEC and other LECs to arrive at a cost-based price model for the
7 nondiscriminatory provision of directory assistance. *DAL Provisioning Order* at
8 ¶38, footnote 99.

9 **Q. What should the Commission use to determine pricing for DAL?**

10 A. Despite the fact that DAL is a UNE and should be made available at TELRIC, the
11 Commission should also consider the nondiscriminatory access provisions of
12 Section 251(b)(3) of the Act and the fact that meaningful competition must be
13 ensured. An analysis under these two principles will produce a similar cost-based
14 result consistent with the Act.

15 1. As discussed earlier with regard to DA/OS, Qwest's prices must
16 not only reflect what it charges other carriers, but nondiscriminatory pricing must
17 also be relative to what Qwest charges itself. Because Qwest is the competing
18 incumbent carrier controlling access to the only meaningful DAL data, Qwest
19 should not be allowed to discriminate against those carriers with whom it
20 competes. Therefore, those prices, or costs, which Qwest incurs in acquiring

1 DAL should be the guiding factor with respect to rates others should pay for the
2 data.

3 2. The Commission should ensure meaningful competition in the DA
4 marketplace exists, and new and innovative DA services are fostered. These
5 principles are the foundation upon which the Act itself was enacted.

6 There is no basis for imposing a "market rate" of 2.5 cents per initial
7 listing and for each update. If a true market were to exist, then the rates would
8 drive toward the cost of the data, which is clearly 3000 times less than Qwest's
9 price. Such inflated prices threaten to barricade any meaningful competition in
10 the market place and have the potential to cause competitors to drop out of the
11 market where there would exist no incentive for further innovation.

12 There have been two publicly available cost studies that WorldCom is
13 aware of that address the cost of providing the DAL Database that have set rates
14 in the range of \$0.001 to approximately \$0.005. Perhaps most relevant is a cost
15 study that was performed by Southwestern Bell Telephone Company ("SWBT")
16 in Texas. That cost study indicated that the cost as found by SWBT in Texas was
17 0.001 cents per listing and a similar price per update. The State of Texas,
18 therefore, required SWBT to provision DAL at those rates and to permit all
19 carriers to use them for both local and interstate purposes. *See, Texas 1998-2000,*
20 *Directory Assistance Listing Cost Study, Total Element Long Run Incremental*

1 *Cost Study, Form 2; cited in, MCI Texas Arbitration Award, Docket 19075, at*
2 *pages 12-14, 1998.*

3 In a second complete look at this issue, the State of New York also found
4 that DAL should be provided at cost. *See, New York Verizon Tariff #916, issued*
5 *pursuant to NYPSC order No. 98-C-1 357 (February 8, 2000); cited in the DAL*
6 *Provisioning Order at fn. 99.* This was the cost-study the FCC pointed to when it
7 encouraged states to set their own rates. In that order, the NYPSC analyzed cost
8 studies provided by Bell Atlantic, INFONXX, and Frontier to arrive at a cost-
9 based price model for the nondiscriminatory provision of DAL. Under the New
10 York scheme, WorldCom's DAL pricing is computed as follows: Initial full
11 extract via electronic file transfer, non-recurring is \$13,464. Daily updates,
12 \$3,637 per month. Stated on a per record basis, this would equate to a full initial
13 transfer of \$0.0014 per listing and daily updates monthly rate of \$0.0051 per
14 listing based on a base file of 9,900,000 listings and an average monthly update of
15 713,000 records.

16 **Q. What is the price WorldCom charges QWEST for listings it provides to**
17 **Qwest?**

18 **A. WorldCom does not charge any ILEC for the listings it provides to carriers at the**
19 **present time.**

20 **Q. Please discuss Qwest's transport fee.**

1 **A.** WorldCom objects to Qwest's insertion of a transport fee of \$0.001 per listing.
2
3 WorldCom has already expended financial and capital resources to build and
4 maintain its own electronic system for receiving DAL information from Qwest
5 known as NDM or "network data mover". Asking WorldCom to pay Qwest to
6 transport the data over WorldCom's own facilities would be asking WorldCom to
7 pay twice for transport and would unjustly enrich Qwest in this regard.

7 **CALL-RELATED DATABASES (LIDB and ICNAM)**

8 **Q.** Are Qwest's proposed charges for LIDB and CNAM reasonable?

9 **A.** The FCC has identified LIDB and CNAM (what Qwest identifies as "ICNAM")
10 as call-related databases. As such, these call-related databases are UNEs and
11 must be made available on a TELRIC or cost-basis. Qwest, however, has
12 identified most of these to be priced on an individual case basis that would allow
13 it to negotiate different prices for access to these services.

14 In addition to TELRIC pricing, however, as UNEs under Section 251(c)(3)
15 of the Act, access to these elements must be on a nondiscriminatory basis, without
16 use restrictions pursuant to Section 251(c)(3) of the Act. To the extent that
17 individual case basis pricing reflects Qwest's desire to discriminate between
18 carriers or force carriers to use these databases for only one type of service (e.g.
19 "local-only" service), WorldCom objects to Qwest's proposal.

20 **Q.** How does Qwest describe the ICNAM service?

1 **A.** Qwest states that the ICNAM service allows CLECs to query Qwest's ICNAM
2 database in order to secure the listed name information associated with the
3 requested telephone number in order to deliver that information to the CLEC's
4 end users. Qwest states that recurring charges for ICNAM are billed on a per
5 query basis and a nonrecurring charge (CCSAC Options Activation Charge) will
6 apply for a CLEC to activate ICNAM Database Query Service.

7 **Q.** **As a matter of policy, should the Commission require Qwest to**
8 **allow WorldCom full access to the Qwest ICNAM database?**

9 **A.** Yes. CLECs should be able to obtain the entire contents of the CNAM database,
10 rather than being restricted to access on a per dip basis. Just as in the case of
11 Directory Assistance Data, offering the CNAM database in such a format is
12 technically feasible and would allow access in the same manner used by Qwest.
13 On the other hand, limiting access to a per-query or "dip" basis discriminates
14 against WorldCom and other CLECs by giving Qwest an unfair advantage. It
15 prevents CLECs from controlling the service quality and management of the
16 database and restricts WorldCom's ability to offer other service offering that
17 would enable it to compete effectively with Qwest in the provision of this UNE.

18 **Q.** **Can you further explain why WorldCom should have access to the entire**
19 **database?**

1 **A.** Yes. This alternative should be made available for several reasons. First, CLECs
2 who operate their own CNAM database are not restricted to the exact same
3 service and process methods as offered or used by Qwest, thus allowing the
4 potential for development of innovative services. Second, for some CLECs, the
5 cost of obtaining the full contents of the database (as an UNE at TELRIC prices)
6 and maintaining their own database may be more economical than requiring them
7 to pay Qwest on a per-dip basis for every query. The Qwest proposed rate sets
8 this price at just over \$.002 per dip. Providing the alternative of bulk data
9 provides potential cost savings to CLECs. Finally, a CLEC that operates such a
10 database to support services for its own end users may also develop the capability
11 to offer CNAM database service to other carriers. This situation would have
12 similar public policy benefits to those provided by resale requirements.

13 **Q.** Are there other efficiencies that result from WorldCom having access to the
14 entire database?

15 **A.** Yes. ICNAM allows the called customer premises equipment,
16 connected to a switching system via a conventional line, to receive a
17 calling party's name and the date and time of the call during the first
18 silent interval in the ringing cycle. This is a very limited time frame
19 within which to determine the name associated with the calling
20 number. As the call reaches the terminating switch and a Caller ID

1 request is made, the request must route through the network to reach
2 the database holding the "name" information. WorldCom must first
3 determine which LEC owns the number, then route the call out to
4 that LEC and back to make the "dip". If the LEC does not have the
5 name, then exception-handling procedures must be used to find the
6 name and the result is finally returned to the called party. The time it
7 takes to route the number request to the correct LEC's database to
8 make the dip, return the request, and provide exception handling
9 when the number is not found in the database cannot always be
10 completed within the short ring cycle required. If, however,
11 WorldCom maintains its own database, via global access to Qwest's
12 database, a lengthy step of the process could be eliminated, allowing
13 WorldCom to provide service at least as good as Qwest provides for
14 itself. Further, requiring WorldCom to "dip" Qwest's database rather
15 than access its own CNAM database also forces WorldCom to incur
16 development costs associated with creating a complex routing
17 scheme within its network. Since Qwest already has its own
18 database, it does not incur the same costs associated with
19 implementing and maintaining a routing scheme. Thus, by enjoying

1 superior access to its CNAM data - data that cannot be accessed or
2 used anywhere else except on a per query basis - Qwest limits
3 WorldCom to an inferior service that it can provide more efficiently,
4 quickly, and cheaply. For these reasons, WorldCom should have full
5 access to Qwest's database; anything less is discriminatory.

6 **Q. Have any states ordered that CLEC should have access to an entire ICNAM**
7 **database rather than be restricted to access of a per-query basis?**

8 **A.** Yes. The Michigan PSC ordered Ameritech Michigan to allow full access to the
9 calling name database rather than being restricted to access on a per-dip basis.

10 **Q. Please summarize WorldCom's position.**

11 **A.** DA/OS services must be provided as UNEs unless Qwest provides customized
12 routing. As a UNE, the pricing must be TELRIC or cost-based pursuant to
13 Section 251(c)(3) of the Act. If Qwest does provide customized routing, it is still
14 obligated to provide nondiscriminatory access to DA/OS pursuant to Section
15 251(b)(3). Nondiscriminatory access means that it must offer DA/OS services at
16 the same price it offers those services to others, including itself. A market-based
17 pricing methodology, therefore, is inherently discriminatory.

18 DAL information, on the other hand, is still a UNE and must be provided
19 at TELRIC-based prices. Even if the FCC were to find DAL was not a UNE, it is
20 still subject to the nondiscriminatory access provisions of Section 251(b)(3) and

1 the Commission should adopt a nondiscriminatory pricing methodology based on
2 cost.

3 Qwest's proposals and pricing regarding customized routing are too vague
4 for Worldcom to comment upon. WorldCom would welcome an opportunity to
5 discuss its routing needs with Qwest to determine whether Qwest's offerings
6 would, indeed, be a viable option for WorldCom.

7 With regard to call related databases, Qwest is obligated to provide LIDB
8 and ICNAM as UNEs at TELRIC-based prices. Worldcom also requests
9 nondiscriminatory access to the ICNAM database on a bulk transfer basis. In
10 addition, as UNEs, Qwest may not discriminate or impose use restrictions on
11 these network elements through any alternate pricing schemes it may propose.

12 **Q. Does this conclude your testimony?**

13 **A.** Yes, it does.